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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

November 28, 2000

EX PARTE

Ms. Magalie Roman Salas  
Secretary  
Federal Communications Commission  
445 – 12<sup>th</sup> Street, SW, TW-A325  
Washington, DC 20554

RE: CC Docket No. 99-200, Number Resource Optimization

Dear Ms. Salas:

On November 27, 2000, Bill Johnston, Mike Whaley, and the undersigned, representing Qwest<sup>1</sup>, met with Yog Varma, Deputy Chief, Common Carrier Bureau, Charles Keller, Chief, Network Services Division, and Aaron Goldberger, also of the Network Services Division. The purpose of this meeting was to discuss new number administration procedures and Qwest's costs to implement thousands-block number pooling pursuant to the FCC's Report and Order<sup>2</sup> in the above referenced docket. The attached material was distributed at the meeting. This material and the cost details submitted in the Comments of Qwest to the FCC's Further Notice of Proposed Rule Making in this docket served as the basis of the discussion.

In accordance with Section 1.1206(b)(2) of the Commission's rules, the original and one copy of this letter and attachments are being filed with your office for inclusion in the public record of this proceeding.

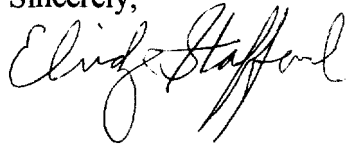
<sup>1</sup> On June 30, 2000, U S WEST, Inc., the parent and sole shareholder of U S WEST Communications, Inc., merged with and into Qwest Communications International Inc. Further, on July 6, 2000, U S WEST Communications, Inc. changed its name to Qwest Corporation.

<sup>2</sup> In the Matter of Number Resource Optimization, CC Docket No. 99-200, Report and Order and Further Notice of Proposed Rulemaking, FCC 00-104, Rel Mar. 31, 2000.

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Acknowledgment and date of receipt of this submission are requested. A duplicate of this letter is included for this purpose.

Sincerely,

A handwritten signature in cursive script, appearing to read "Elvira Stafford". The signature is written in black ink and is positioned below the word "Sincerely,".

Attachments

cc: Yog Varma  
Charles Keller  
Aaron Goldberger

# **Number Resource Optimization**

**CC Docket No. 99-200**

**Part I**

**November 27, 2000**

**Qwest**

**Bill Johnston, Elridge Stafford**

**Mike Whaley**

# **Agenda of Issues**

## **Part I**

**Qwest Rate Center Consolidation**

**MTE - Switch vs Rate Center**

**Pooling and Administration Cost Recovery**

**45 Day Reservation Limit**

# **Qwest Rate Center Consolidation**

- **Qwest has strongly supported rate center (RC) consolidation as a numbering resource optimization measure since 1996**
  - **Colorado - Completed one of the largest consolidations in the country - 44 rate centers down to 16 rate centers**
  - **Minnesota - Consolidated 21 rate centers into 1 rate center in Minneapolis-St. Paul metro area**
  - **Arizona - 18 rate centers in Phoenix were consolidated into 1 rate center.**
- **Qwest is presently considering RC consolidation in Iowa, Oregon and Washington.**

# MTE Switch vs Rate Center

- **The FCC was correct in its reasoning that rate center-based utilization is better than NPA-based utilization.**

*“...some NPAs contain both suburban/rural and urban areas. In such “mixed” NPAs, carriers might have high utilization rates in rate centers located in densely populated areas of the NPA, and lower utilization rates in the more rural or suburban rate centers in the NPA. As a consequence, a carrier may be unable to meet an NPA-wide utilization rate, even when it is running into numbering shortages in particular rate centers in more densely populated areas.”*  
(¶ 105 NRO Order)

- **Qwest is concerned about the effect of multiple switches in one RC, when calculating Months-to-Exhaust (MTE) where 1K pooling is not yet deployed.**
- **Pooling is necessary for Qwest to intra-service provider port 1K blocks of between switches. Qwest cannot intra-service provider port at this time.**

# **MTE Switch vs Rate Center**

## **Impact of MTE Criteria on Multi-Switch Rate Centers**

- **As required, NANPA is strictly following the FCC's rate center level MTE criteria.**
- **In certain circumstances this can adversely affect relief for switches that require:**
  - **Growth codes for new customer demand**
  - **Multiple blocks or full codes for large customer requests**
  - **Initial code request for new switches**
  - **CO codes in the new NPA of a geographic split**

# MTE Switch vs Rate Center

- **The Consequences of MTE reporting at the RC level depends on the particular network configuration.**
- **Qwest uses two different network configurations: one in its local exchange company, the other in its wireless affiliate.**
  - **The adverse effects can occur where multiple switches serve a single RC and can be most severe where multiple RCs have been consolidated into a single RC.**
  - **On the other hand, reporting MTE at the RC level works well for carriers whose switches serve multiple RCs (e.g., Qwest Wireless).**



# MTE Switch vs Rate Center

- **Qwest (LEC) has 909 rate centers.**
- **152 of those rate centers have multiple switches.**
  - **16 of the 152 multiple switch rate centers have 10 or more switches. For example:**

• Seattle	<b>22</b> switches
• Phoenix	<b>21</b> switches
• Tucson	<b>22</b> switches
• Denver	<b>52</b> switches
• Twin Cities	<b>65</b> switches

# MTE Switch vs Rate Center

- **There are a number of areas where Qwest has switches that are expected to exhaust prior to implementation of pooling, but will not be able to meet the RC MTE threshold for acquiring additional codes.**
- **Examples:**
  - **Denver RC: 52 switches in the RC, 16 are expected to exhaust within 6 months**
  - **Seattle RC: 26 switches in the RC, 7 switches are expected to exhaust within 6 months.**
  - **Phoenix R: 21 switches - 6 are expected to exhaust within 6 months**
  - **Tucson RC: 22 switches - 6 are expected to exhaust within 6 months**

# MTE Switch vs Rate Center

- **Qwest may have to request a waiver in instances where the following exist:**
  - multiple switches exist in the RC, the MTE for the RC exceeds the threshold for obtaining codes, and pooling is not yet deployed.
- **Qwest proposes that, where a carrier has multiple switches in the RC, the FCC waive the MTE RC level criteria for obtaining numbering resources until pooling is deployed in that RC.**

# **Pooling and Administration Cost Recovery**

- **Qwest's preliminary cost study indicates it will incur substantial costs to comply with the Commission's number pooling and other number administration mandates.**
  - **Estimated recoverable costs for thousands block pooling: \$335 million.**
  - **Estimated recoverable costs for other mandated number administration requirements: \$13 million.**
  - **Estimated offset due to deferral of code splits: \$3 million.**
  - **Estimated net recoverable costs: \$345 million.**

# **Pooling and Administration Cost Recovery**

- **The commission must allow carriers to recover all their cost specifically related to thousands block pooling implementation and administration,**
  - **Network changes, OSS changes, Service Delivery, SSP acceleration.**
- **The Commission must allow carriers to recover costs of other mandated number administration procedures and processes,**
  - **Reserve numbers, six month inventory, number analysis and reporting.**

# **Pooling and Administration Cost Recovery**

- **The Commission should adopt a two part cost recovery mechanism.**
  - **Allow recovery of non-recurring costs through an end-user surcharge like the LNP surcharge or added to the LNP end-user surcharge.**
  - **Recurring costs should be recovered through a charge added to the Subscriber line Charge (SLC).**

# **45 Day Reservation Limit**

- **Qwest requests that the treatment of “Reserved Numbers” be modified.**
- **Number reservation impacts a very small percentage of numbers, less than one half of one percent of all the numbers assigned to Qwest.**
- **45 day limits will not improve efficiency of utilization.**
- **Current business practice meets the needs and expectations of customers.**
- **Creates disparity between Centrex and PBX service providers**

# **Number Resource Optimization**

**CC Docket No. 99-200**  
**Supplement to Part I**

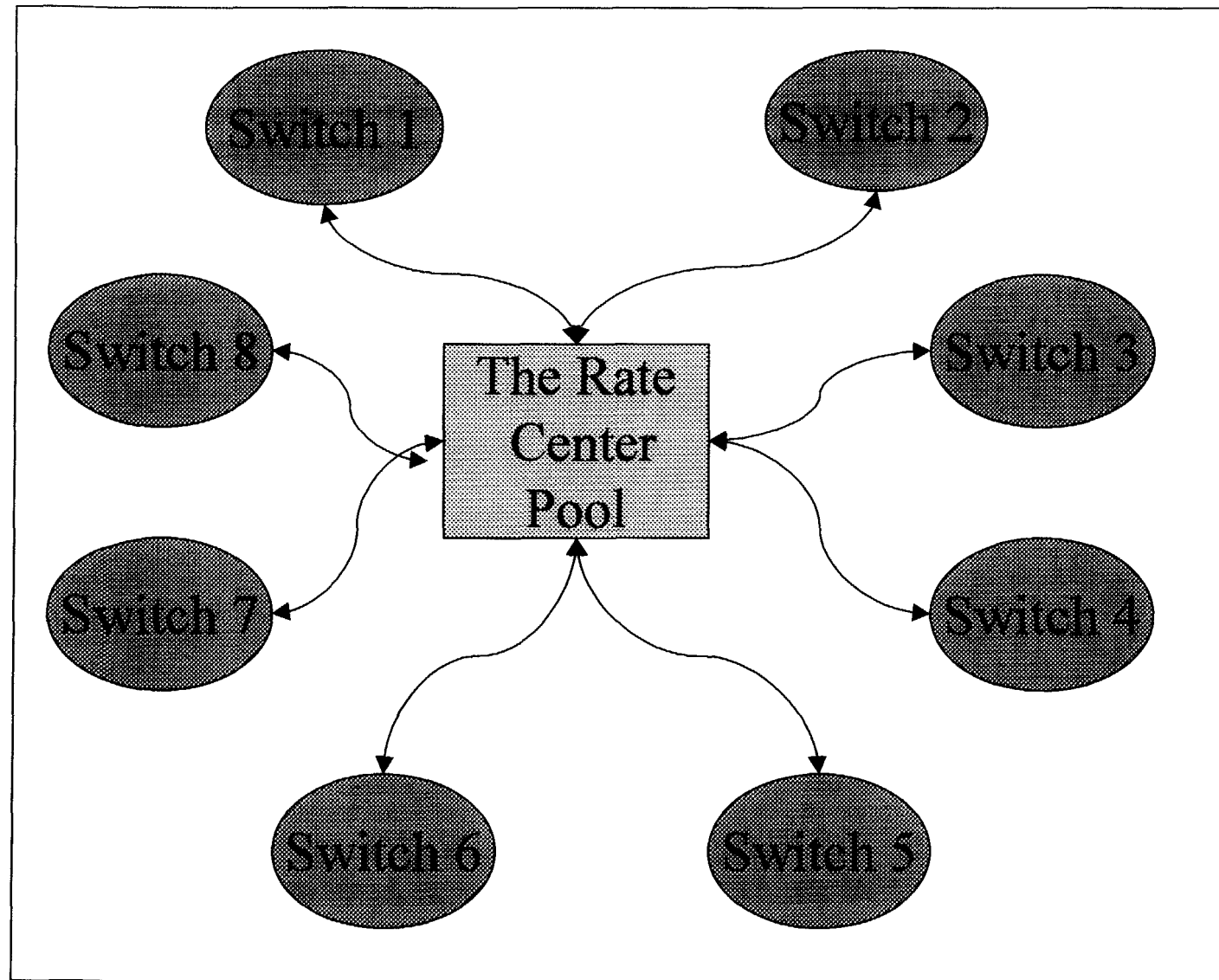
November 27, 2000

**Qwest**

Bill Johnston, Elridge Stafford  
Mike Whaley

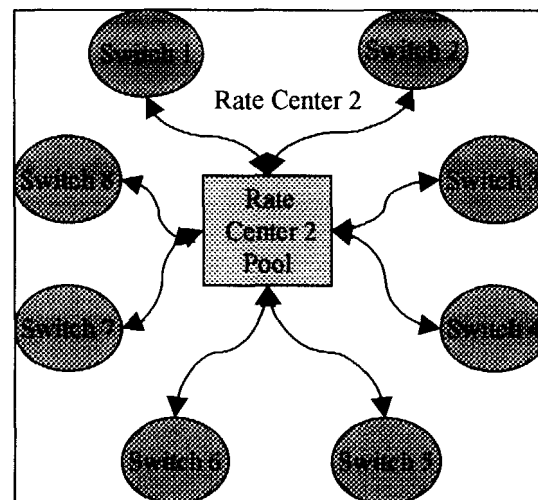
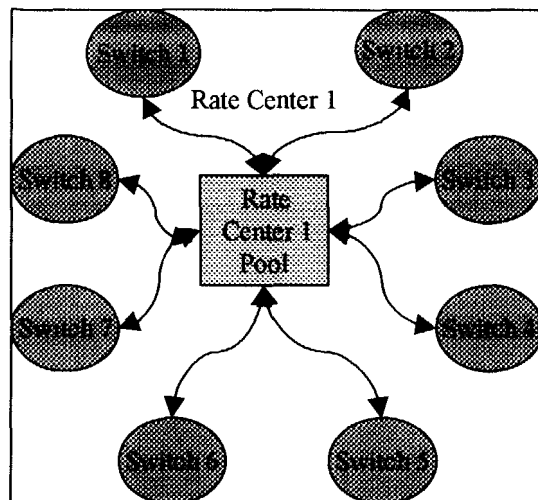


## One Rate Center-Multiple Switches

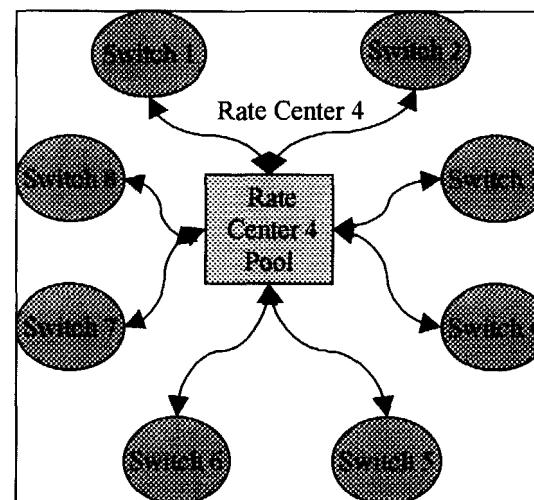
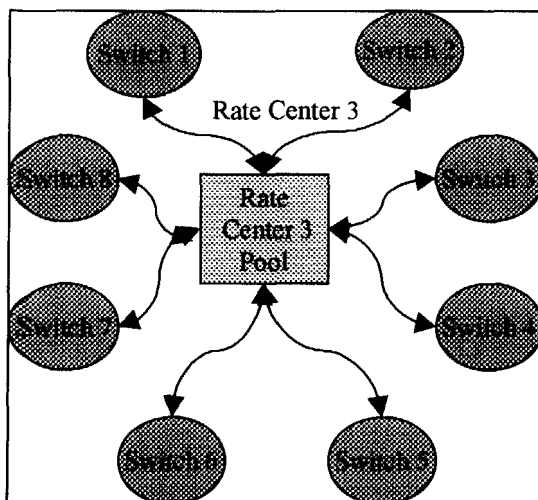


Rate Center

## One NPA with Multiple Rate Centers and Multiple Switches



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# MTE Switch vs Rate Center

## Washington RC Example

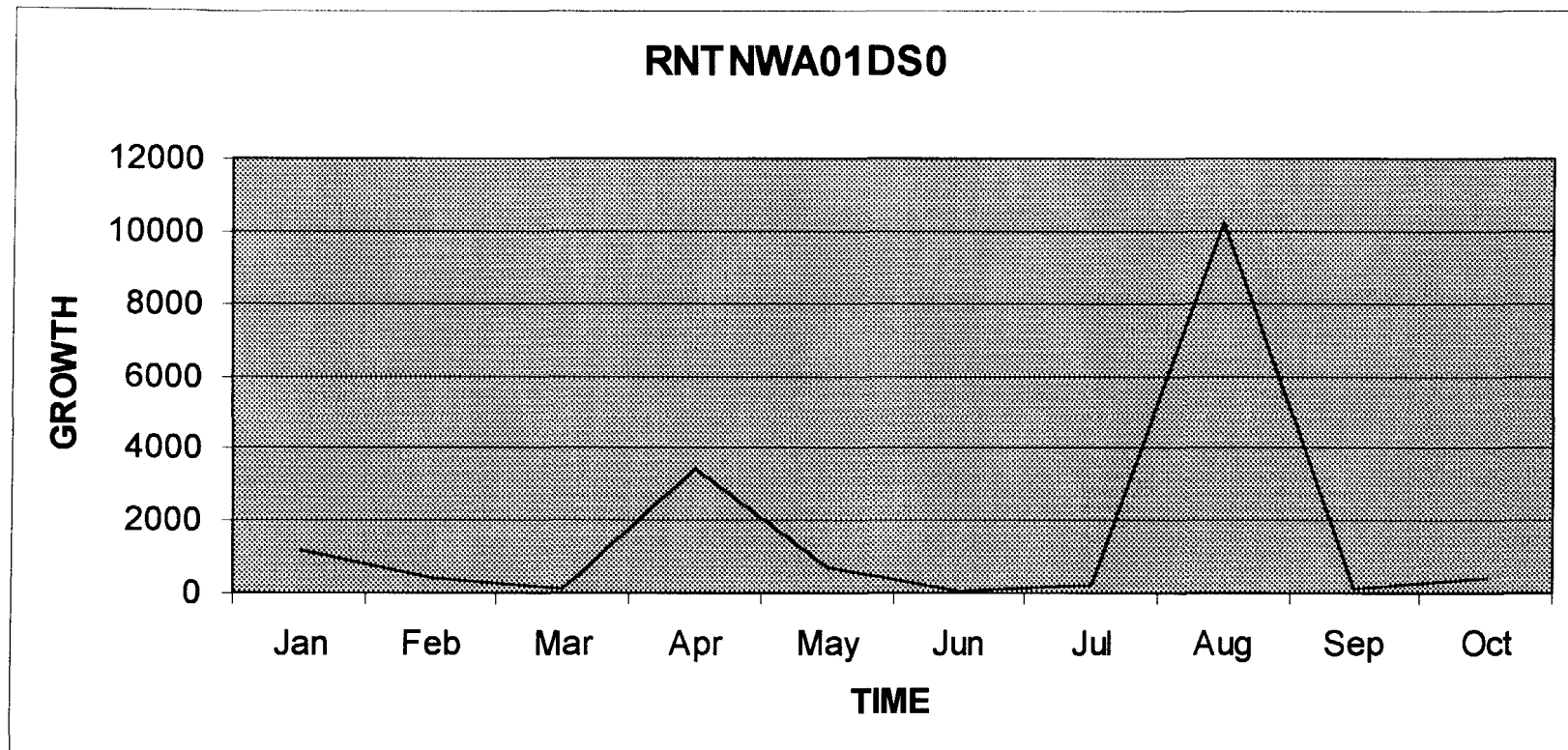
*RATE CENTER: 206 SEATTLE - 26 Switches RC MTE 5 Months*

SWITCH	EXPECTED POOLING TRIAL DATE	MTE	POTENTIAL HELD ORDERS
STTLWACHDS0	Jun-01	0	<i>Dec-00</i>
STTLWA06DS4	Jun-01	1	<i>Dec-00</i>
RNTNWA01DS0	Jun-01	2	<i>Jan-01</i>
STTLWA05DS0	Jun-01	3	<i>Feb-01</i>
STTLWA06DS8	Jun-01	6	<i>May-01</i>
STTLWA06DS6	Jun-01	7	<i>Jun-01</i>
STTLWA06DSA	Jun-01	8	<i>Jul-01</i>

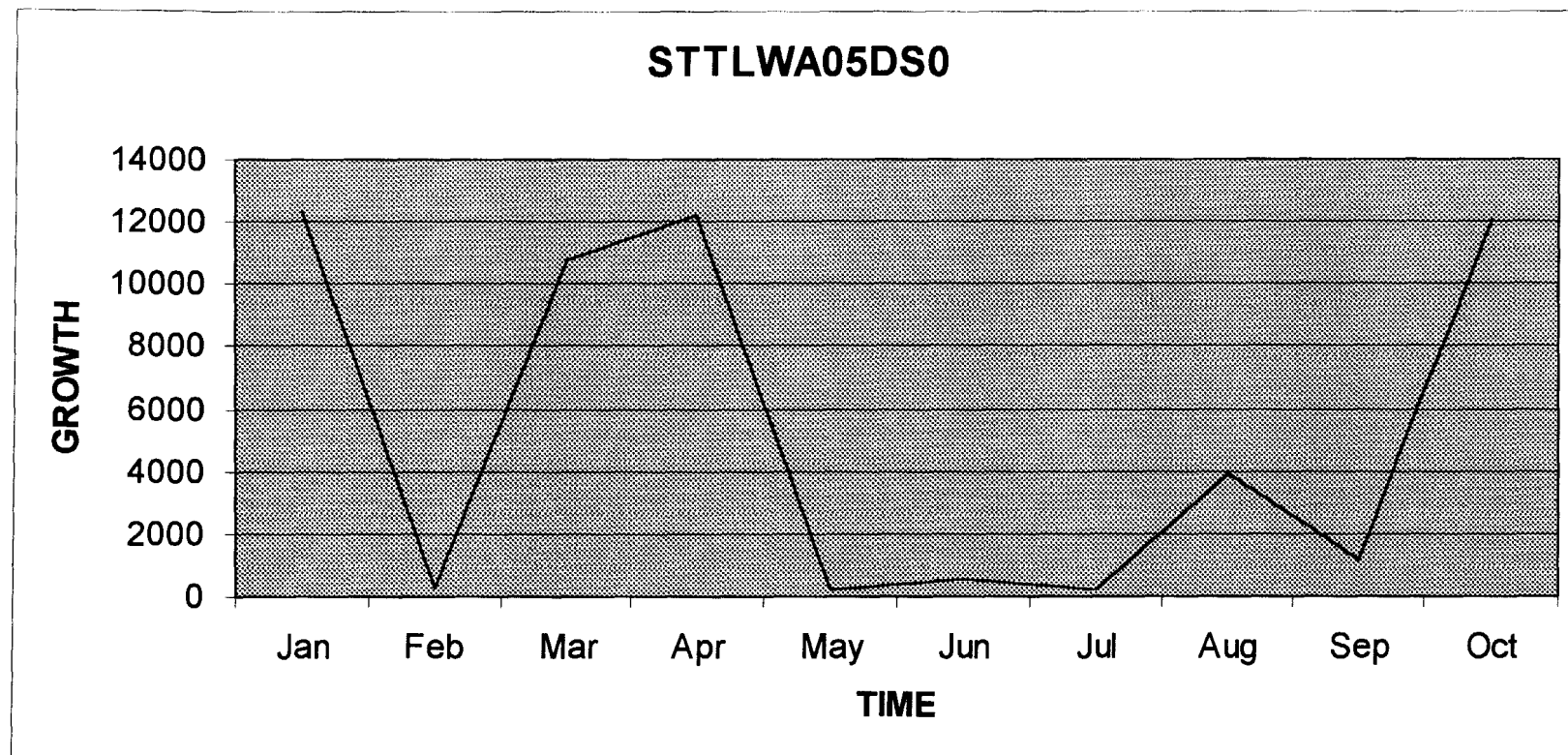
**Out of 26 Switches, these 7 are at risk of taking “held orders” before the ”estimated pooling date”**

**Of those 7 Switches, 2 are at risk of taking “held orders”in December 2000**

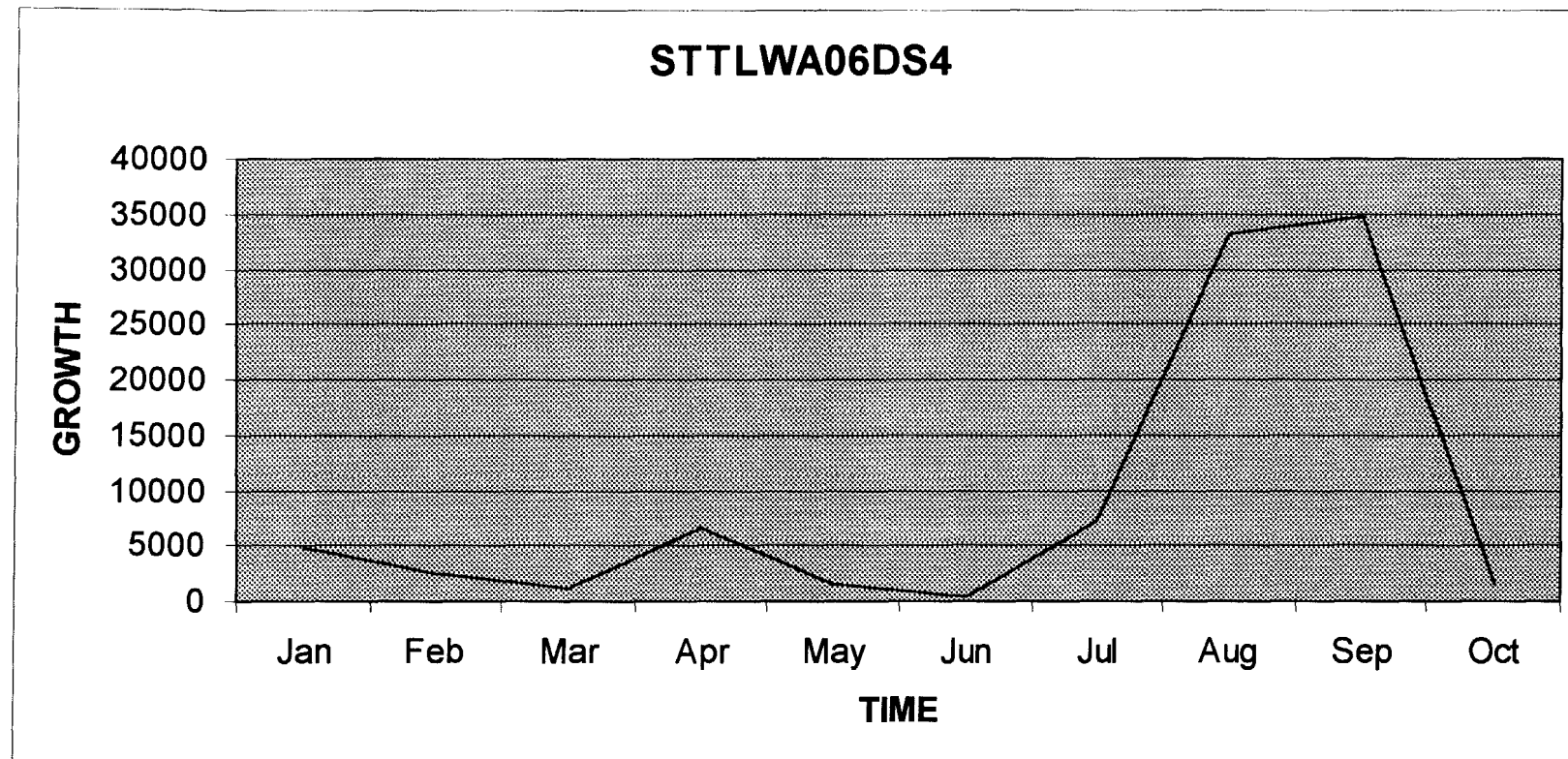
# Washington Switch Data



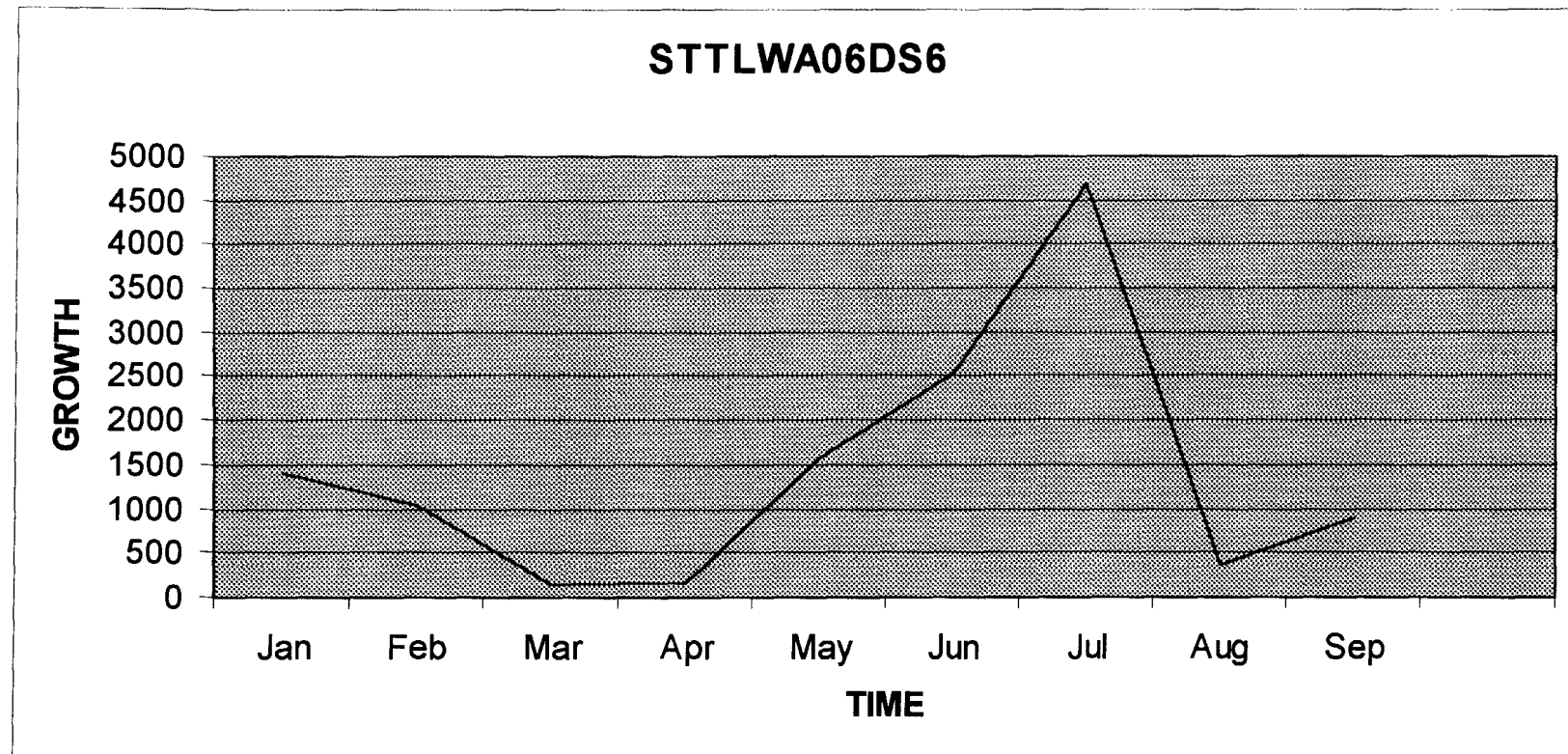
# Washington Switch Data



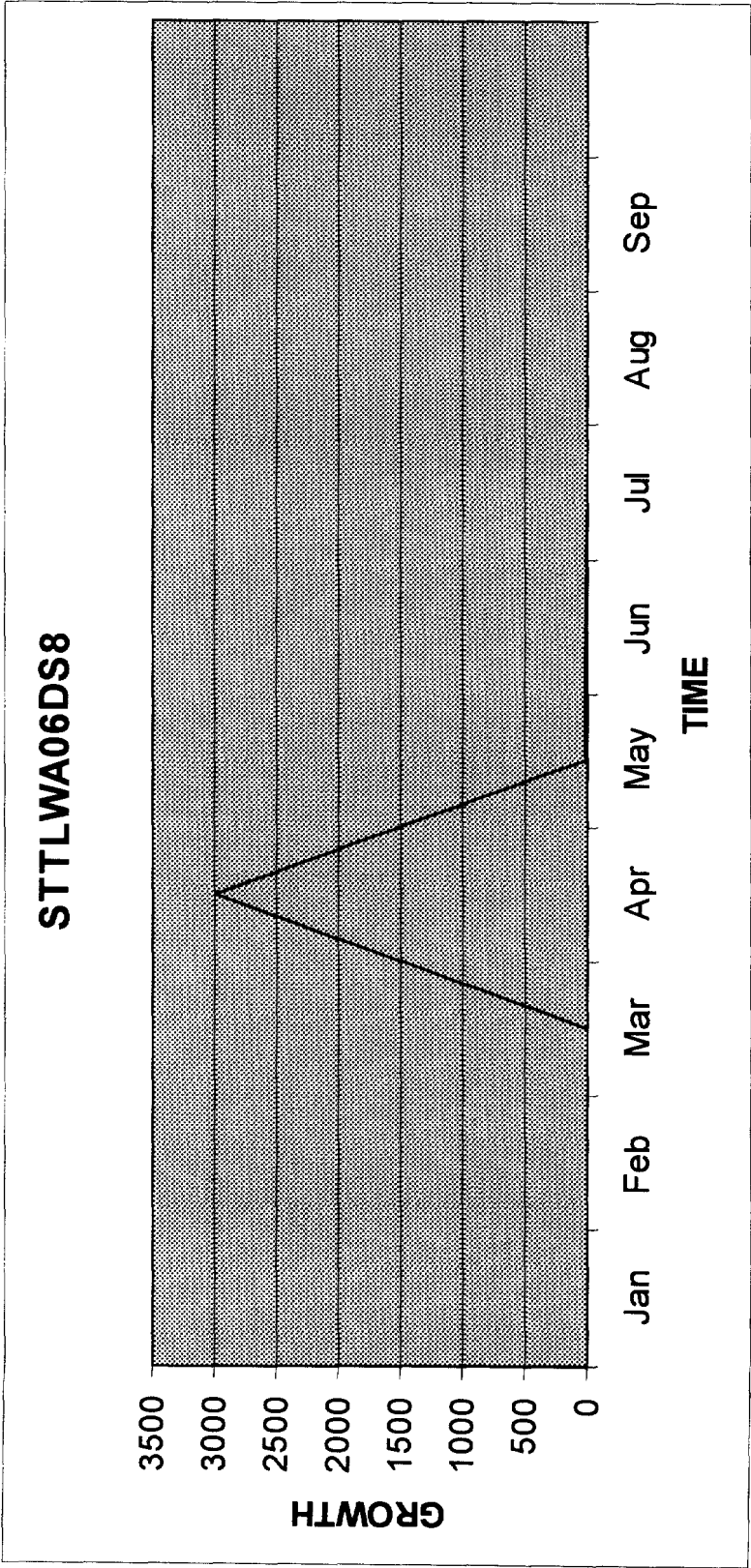
# Washington Switch Data



# Washington Switch Data



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# Washington Switch Data

